

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

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| LA UNIÓN DEL PUEBLO ENTERO, <i>et al.</i> , <i>Plaintiffs,</i> | § § § § § § § | Case No. 5:21-cv-844-XR (Consolidated Cases) |
| v. | | |
| THE STATE OF TEXAS, <i>et al.</i> , <i>Defendants.</i> | | |

**STATE DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE RESPONSE TO MOTION TO COMPEL**

State Defendants, the State of Texas and John Scott, in his official capacity as Secretary of State, file this Unopposed Motion for Extension of Time to File Response to the United States' Opposed Motion to Compel (ECF 205) and show the Court the following:

1. On January 24, 2022, Plaintiff United States filed an Opposed Motion to Compel Production (ECF 205).
2. Pursuant to Local Rule CV-7(d)(2), State Defendants' deadline to file a response is January 31, 2022.
3. Counsel for State Defendants are participating in a four-day preliminary injunction hearing in *Brooks, et al. v. Abbott, et al.*; Case No. 1:21-cv-991 (W.D. Tex.), that began on January 25, 2022.
4. State Defendants respectfully request that the Court extend the deadline to file their response to the United States' Opposed Motion to Compel Production up to and including February 4, 2022.
5. On January 24, 2022, the undersigned counsel conferred with counsel for the United States concerning this request. Plaintiff does not oppose the requested extension.
6. This motion is not presented for purposes of delay and will not prejudice any party to this litigation.

Date: January 26, 2022

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

Respectfully submitted.

PATRICK K. SWEETEN
Deputy Attorney General for Special Litigation
Tex. State Bar No. 00798537

WILLIAM T. THOMPSON
Deputy Chief, Special Litigation Unit
Tex. State Bar No. 24088531

ERIC A. HUDSON
Senior Special Counsel
Tex. Bar No. 24059977

KATHLEEN T. HUNKER
Special Counsel
Tex. State Bar No. 24118415

LEIF A. OLSON
Special Counsel
Tex. State Bar No. 24032801

/s/ Jeffrey M. White
JEFFREY M. WHITE
Special Counsel
Tex. State Bar No. 24064380

OFFICE OF THE ATTORNEY GENERAL
P.O. Box 12548 (MC-009)
Austin, Texas 78711-2548
Tel.: (512) 463-2100
Fax: (512) 457-4410
patrick.sweeten@oag.texas.gov
will.thompson@oag.texas.gov
eric.hudson@oag.texas.gov
kathleen.hunker@oag.texas.gov
leif.olson@oag.texas.gov
jeff.white@oag.texas.gov

COUNSEL FOR STATE DEFENDANTS

CERTIFICATE OF CONFERENCE

I hereby certify that on January 24, 2022, I conferred with Dan Freeman, counsel for Department of Justice, via phone call regarding this Motion. Plaintiff does not oppose the requested extension.

/s/ Jeffrey M. White
Jeffrey M. White

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on January 26, 2022, and that all counsel of record were served by CM/ECF.

/s/ Jeffrey M. White
Jeffrey M. White